SPILL PREVENTION, CONTROL, AND COUNTERMEASURES BEST MANAGEMENT PLAN

NOAA

NATIONAL WEATHER SERVICE

Memphis Weather Forecast Office 7777 Walnut Grove Road Memphis, Tennessee 38120

Designated Person Responsible	for Spill Prevention (DRO):	
Printed Name:	Margaret Trippany	
Signature:		
Date:		
Telephone:	(901) 544-0412	
The Regional Environmental Compliance Officer (RECO) has reviewed the facility and determined that an SPCC Plan is not required per 40 CFR 112. This Plan is developed strictly as a Best Management Plan. The determination is based on: The facility does not exceed capacity The facility meets capacity requirements but, a discharge will not reach navigable waterways.		
RECO Printed Name:	Mark George	
RECO Signature:		
Date:		

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PART I - GENERAL INFORMATION

A. GENERAL

This section of the Best Management Plan provides general information about the facility.

1. Name:

National Weather Service (NWS) Memphis Weather Forecast Office (WFO)

2. Date of Initial Operation:

1993

3. Location:

Street: 7777 Walnut Grove Road

City: Memphis

State/Zip Code: Tennessee 38120

4. Name and phone number of owner (Point of Contact)

Margaret Trippany Environmental Focal Point (901) 544-0412

5. Facility Contacts

Terry Brisbin NWS Southern Region Environmental/Safety Coordinator (817) 978-7777, Ext. 139

B. SITE DESCRIPTION AND OPERATIONS

The Memphis WFO is located in Memphis, Tennessee, approximately 10 miles east of downtown Memphis. Emergency backup power is provided to the WFO by a 175-kilowatt emergency generator, typically needed during weather-related power outages. The generator also operates 3 to 4 hours per month for maintenance purposes. Approximately 5 gallons per month of fuel are used on average.

The diesel fuel that is used to power the generator is stored in a 500-gallon above ground storage tank (AST) and a 50-gallon day tank. Fuel is pumped on demand from the 500-gallon AST to the 50-gallon day tank, which feeds the generator. The emergency generator and a steel day tank are housed in an enclosed brick building. Both the generator building and the 500-gallon AST rest on a concrete slab foundation.

The 500-gallon AST is a welded steel plate tank enclosed inside a concrete outer shell that provides containment and protects the AST and the secondary containment area from exposure to precipitation. A round spill container with a capacity of 3 gallons surrounds the fill spout. The 500-gallon AST has a 2-inch-diameter vent and a 6-inch-diameter emergency vent. The 500-gallon AST is connected to a pump on top of the 50-gallon day tank via a double-walled line that travels through the wall of the WFO generator building. The 50-gallon day tank is a rectangular steel tank equipped with an overflow tank. The day tank is connected to the generator by flexible stainless steel and rubber supply and return lines.

Drainage from the area of the AST and generator building flows to the northwest and along a gravel road that leads to storm sewers along Walnut Grove Road. These storm sewers flow into drainage ditches west of the NWS property, which flow to unnamed tributaries of Fletcher Creek. The unnamed tributaries are approximately 1.4 miles from the site.

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The facility should maintain spill kit materials such as absorbent pads and mats sufficient to prevent a spill from reaching a nearby water body, and a disposal container. The facility currently maintains spill kit materials in the generator building that include absorbent pads and socks that can be used to divert a small spill. The kits also include two 25-gallon containers and one 85-gallon container that can be used as disposal containers.

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PART II - OPERATIONAL PROCEDURES FOR SPILL PREVENTION AND CONTROL

1. Fuel Unloading

- a. Appendix A includes a Tank Ullage and Fueling Log (Appendix A-1) that should be used when fuel is delivered.
- b. Appendix A also contains a Fuel Unloading Procedure Checklist (Appendix A-2) that includes a list of procedures that should be implemented when fuel is delivered.

2. Inspections and Records

<u>Inspection and Maintenance of Tanks</u>: The AST and generator day tank should be inspected weekly for any oil outside the tanks, especially at seams (including the underside). The outside of any exposed piping should be inspected weekly, especially at the joints such as gasket fittings. Monthly and annual inspections should follow the checklists presented in Appendix B.

<u>Record Keeping</u>: The designated person responsible for spill prevention or alternate representative is responsible for completing the ullage logs and documenting fuel unloading procedures. These records, as well as records of all inspections, should be maintained for at least 5 years from the time of inspection.

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PART III - SPILL COUNTERMEASURES AND REPORTING

A. SPILL COUNTERMEASURES

This section presents countermeasures to contain, clean up, and mitigate the effects of an oil spill that impacts navigable waters or adjacent shorelines.

A spill containment and cleanup activity will never take precedence over the safety of personnel. No countermeasures will be undertaken until conditions are safe for workers. The **SWIMS** procedure should be implemented as countermeasures as follows:

- **S** Stop the leak and eliminate ignition sources.
 - a. Attempt to seal or some how stop leak if it can be done safely.
 - b. Attempt to divert flow away from the drainage ditch with a spill barrier or the contents of spill kit.
 - c. Eliminate all ignition sources in the immediate area.
- W Warn others.
 - a. Yell out "SPILL." Inform the person in-charge at your facility.
 - b. Account for all personnel and ensure their safety.
 - c. Notify contacts and emergency response contractor as described in the following section for assistance in control and cleanup.
- **I** Isolate the area.
 - a. Rope off the area.
- **M** Minimize your exposure. Stay upwind.
- **S** Stand by to assist the emergency response contractor, if necessary.

B. SPILL REPORTING

1. General Notification Procedures for All Spills

Within 24 hours, the responsible person or designee (DRO on this plan title page) is directly charged with reporting <u>all</u> oil spills that result from facility operations as follows

- a. In the event of an emergency (for example, fire or injury), call **9-1-1** (if "9" is required to obtain an outside telephone line, it may be necessary to dial **9-9-1-1**).
- b. Notify the following NWS and NOAA regional and headquarters personnel.
 - Mike Jacob, (301) 713-1838 Ext. 165, <u>JMichael.Jacob@noaa.gov</u>, NWS Environmental Compliance Officer
 - Olga Kebis, (301) 713-1838 Ext. 173, Olga.Kebis@noaa.gov, NWS Safety Officer
 - Terry Brisbin, (817) 978-7777, Ext. 139, <u>Terry.Brisbin@noaa.gov</u>, NWS Southem Region Environmental/Safety Coordinator
 - Mark George, (303) 497-3064, Mark.George@noaa.gov, NOAA Mountain Regional Environmental Compliance Officer
- c. The RECO shall determine if Federal or state notification is required and follow up

accordingly.

2. Cleanup Contractor Notification

An emergency response contractor should also be notified to assist with the clean up, if necessary. NWS has identified the following contractors that are available for an emergency response or waste disposal:

<u>Contractor</u>	Phone Number
Jim's Tank Service	(901) 357-7237
Philips Environmental Services	(800) 567-7455
Safety-Kleen	(901) 357-3600

3. Spill Report

The form in Appendix C should be used to complete a spill report. This form should be sent, preferably by e-mail, to the NOAA representatives listed above.

C. Training

The designated person responsible for spill prevention and an alternate should be trained on the fuel unloading procedure and inspection requirement. Additionally, these persons should be trained in spill countermeasures. The alternate should be designated in case the primary person is off site at the time of a spill.

Training should be conducted once annually.